

HEARING DATE: OCTOBER 24, 2011 AT 11:00 A.M. (PREVAILING EASTERN TIME)
OBJECTION DEADLINE: OCTOBER 20, 2011 AT 4:00 P.M. (PREVAILING EASTERN TIME)

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GSC RECOVERY IIA GP, L.P., GSC RECOVERY III GP, L.P.,
GSC RIIA, LLC, and GSC RIII, LLC

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	
GSC GROUP, INC., <u>et al.</u>)	Case No. 10-14653 (AJG)
)	
Debtors.)	Jointly Administered
)	
)	

NOTICE OF HEARING

PLEASE TAKE NOTICE that on September 30, 2011, GSC Recovery IIA GP, L.P. (“GPIIA”) and GSC Recovery III GP, L.P. (“GPIII”), GSC RIIA, LLC (“RIIA LLC”) and GSC RIII, LLC (“RIII LLC”), together with certain other general partners listed on Exhibit A attached hereto (GPIIA, GPIII, RIIA LLC, RIII LLC and the entities on Exhibit A together, the “GPs”), filed the *Motion of GSC Recovery IIA GP, L.P., GSC Recovery III GP, L.P., GSC RIIA, LLC, GSC RIII, LLC and Certain Other General Partners to Deem Late Claims Timely Filed* (the

“Motion”) with the United States Bankruptcy Court for the Southern District of New York (the **“Bankruptcy Court”**).

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion has been scheduled for **October 24, 2011 at 11:00 a.m. (Prevailing Eastern Time)** before the Honorable Arthur J. Gonzalez, Chief United States Bankruptcy Judge, One Bowling Green, Room 523, New York, New York, 10004 (the **“Hearing”**), which Hearing may be adjourned from time to time without further notice other than an announcement at the Hearing.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing and shall conform to the Order Implementing Case Management Procedures [Docket No. 30], the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy Court with a copy delivered directly to the chambers of the Honorable Arthur J. Gonzalez and served on (a) Latham & Watkins, LLP, 233 South Wacker Drive, Suite 5800, Chicago, IL 60606, Attn. Douglas Bacon and Alice Burke; (b) Sherman & Sterling LLP, 599 Lexington Avenue, New York, NY 10022, Attn. Andrew V. Tenzer, Susan A. Fennessey and Randall L. Martin; (c) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, NY 10004, Attn. Andrea B. Schwartz; (d) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002; and (e) any other parties affected by this Motion, in each case so as to be received no later than **4:00 p.m. (Prevailing Eastern Time) on October 20, 2011** (the **“Objection Deadline”**).

If no objections are timely filed and served with respect to the Motion, the relief requested in the Motion shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without further notice or opportunity to be heard. In furtherance

thereof, if no objections are timely filed and served with respect to the Motion, the Debtors may, on or after the Objection Deadline, submit to the Bankruptcy Court an order, substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further opportunity to be heard. Objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted upon default.

Dated: October 5, 2011

Respectfully submitted,

New York, NY

LATHAM & WATKINS LLP

By: /s/ Douglas Bacon

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Recovery III GP, L.P., GSC RIIA, LLC, GSC RIII, LLC

Exhibit A

GSC European Mezzanine GP, L.L.C.
GSC European Mezzanine Investors, L.P.
GSC European Mezzanine Offshore GP, Ltd.
GSC New Offshore GP, L.P.
GSC European Mezzanine II GP, L.L.C.
GSC European Mezzanine Investors II, L.P.
GSC European Mezzanine Offshore II GP, Ltd.
GSC New Offshore II GP, L.P.
GSC RII, LLC
GSC Recovery II GP, L.P.